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Before the  
Federal Communications Commission  
Washington, D.C. 20554

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AUG 15 2001

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

In the Matter of )  
Petition of AT&T Communications )  
of Virginia, Inc., Pursuant )  
to Section 252(e)(5) of the )  
Communications Act, for Preemption )  
of the Jurisdiction of the Virginia )  
State Corporation Commission )  
Regarding Interconnection Disputes )  
with Verizon Virginia, Inc. )

CC Docket No. 00-251

In the Matter of )  
Petition of WorldCom, Inc. Pursuant )  
to Section 252(e)(5) of the )  
Communications Act for Expedited )  
Preemption of the Jurisdiction of the )  
Virginia State Corporation Commission )  
Regarding Interconnection Disputes )  
with Verizon Virginia Inc., and for )  
Expedited Arbitration )

CC Docket No. 00-218

**RESPONSE OF AT&T AND WORLDCOM  
TO VERIZON'S MOTION TO EXTEND THE TIME  
FOR FILING TESTIMONY AND FOR A PROTECTIVE ORDER**

AT&T and WorldCom hereby respond to Verizon's August 13 "Motion to Extend the Time for Filing Testimony and for a Protective Order." AT&T and WorldCom do not oppose a one-week extension of the filing dates for rebuttal and surrebuttal testimony on cost issues, an extension that would leave a two week interval between the filing of surrebuttal testimony and the beginning of hearings. Indeed, AT&T and WorldCom believe that such an extension is warranted by Verizon's massive failure to provide adequate workpapers for its cost studies, and to respond in a timely and complete fashion

to properly filed data requests by AT&T and WorldCom.<sup>1</sup> AT&T and WorldCom strongly oppose, however, either (1) a longer extension of time, or (2) Verizon's arbitrary and unprecedented proposal to limit the number of discovery requests that Verizon must answer.

(1)

There is no basis for Verizon's assertion that AT&T and WorldCom have "abused the discovery process" by serving an excessive number of questions. Verizon has not identified *any* discovery request that fails to seek material and probative information concerning Verizon's cost models.<sup>2</sup> In fact, the discovery requests posed by AT&T and WorldCom are essential.

Verizon's cost models are large, cumbersome, poorly integrated and difficult to analyze. They fill four cartons and three CD-ROMs, and purport to develop recurring costs for 167 unbundled network elements, as well as more than 300 non-recurring charges. As explained in the testimony of Verizon's witness panel, much of the support for Verizon's cost study inputs and assumptions is Verizon's own internal records and

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<sup>1</sup> As of the date of this filing, Verizon is late in responding to 104 of 151 of the outstanding AT&T/WorldCom data requests.

<sup>2</sup> In this regard, it is Verizon, not AT&T or WorldCom, that has abused the discovery process. That process calls for a party that objects to an interrogatory to state with specificity the grounds for that objection. Then the party responsible for the interrogatory is in a position to understand the objection and respond to it. If the parties cannot agree about the propriety of a question, either would then be free to have the matter resolved by the Commission. But Verizon for the most part has filed no specific objections whatsoever, and in its motion it makes no claim that any particular interrogatory is improper. It is thus asking the Commission to strike discovery without ever having objected to it or explaining why it is improper. Instead, its only claims are that the interrogatories are not timely and that they are too numerous. But as explained above, these claims on their face lack merit; the interrogatories all are timely filed under well understood Commission rules, and those rules do not limit the number of interrogatories that may be filed.

historical experience. While Verizon has included some supporting data in the materials filed with its cost studies, the data are highly aggregated, and the additional information sought through discovery is critical to understanding whether Verizon's claims are valid.

For example, AT&T/WorldCom's First and Second Sets of Data Requests seek detailed information underlying Verizon's claimed investment loadings for a forward-looking study, which are based strictly on Verizon's 1998 equipment installation experience.<sup>3</sup> This information is critical to determining whether Verizon's historical experience has any relevance whatsoever in the forward-looking TELRIC environment. Similarly, Verizon's purportedly forward-looking expenses are based on its 1999 historical operating expenses. AT&T/WorldCom's Fifth Set of Data Requests seeks information relating to the amount of year 2000 compliance expenses included in Verizon's 1999 expenses. These historical expenses are not recurring and should be eliminated from a forward-looking cost study. Most of the information sought by AT&T/WorldCom relates to data that should be readily available to Verizon and directly supports inputs and assumptions in the cost studies.

Verizon's suggestion that the Federal Rules of Civil Procedure 33(a) supports an arbitrary limit on the number of discovery requests in these cases is frivolous. The Federal Rules do not apply to this case. Moreover, the discovery limits imposed by the Federal Rules may be modified for good cause, Fed. R. Civ. P. 26(b)(2), and are customarily enlarged in highly complex cases.

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<sup>3</sup> Copies of AT&T/WCOM's First, Second and Third Sets of Data Requests as well as AT&T's Ninth Set to Verizon are attached.

(2)

Equally without merit is Verizon's claim that the AT&T and WorldCom discovery requests were untimely. The discovery guidelines established by the Commission for this proceeding—without objection by Verizon—entitle any party to serve discovery at any time until August 21, 2001, four days after the deadline for filing rebuttal testimony. *See* FCC letter ruling dated July 11, 2001. That deadline has not yet arrived, so Verizon cannot claim that any of the discovery it has received is late filed.

The time needed to review Verizon's cost studies and to formulate discovery requests has been further increased by the complexity of Verizon's cost studies (discussed above), and the novelty of much of Verizon's supporting material. For the Virginia proceeding, Verizon has produced what purport to be new studies and documentation not previously submitted in other jurisdictions. Much of the Virginia discovery had to be specifically tailored to the new Verizon materials. With the substantial work effort involved in distributing and analyzing those materials, it can hardly be considered abuse of process for AT&T and WorldCom to require three weeks (the first of which included the Fourth of July holiday) to begin serving data requests, nor it is surprising that Verizon's models generated a large number of questions.

(3)

Verizon's claim that it lacks resources to respond to discovery is disingenuous at best. At least 74 individuals have executed the protective agreement on Verizon's behalf. These individuals include at least 18 lawyers working on this case, including at least two very large outside firms, all of whom are capable of helping prepare discovery

responses.<sup>4</sup> Verizon also has a large number of subject matter experts assigned to this proceeding, including several professionals affiliated with NERA, one of the largest economic consulting firms in the United States. *See* [www.nera.com](http://www.nera.com). If these individuals were inadequate to meet Verizon's regulatory obligations in this and other forums in a timely fashion, Verizon—a Fortune 100 company with a dominant market position in every local market it serves—had both the resources and the obligation to devote whatever additional resources were necessary.

And while it may be true, as Verizon asserts, that some of those individuals are also litigating similar issues in Maryland, Washington, D.C., and Delaware, many of the issues are common across jurisdictional boundaries, meaning that the work effort to respond to discovery in this proceeding is largely duplicative, or no worse than incremental, to what is occurring here. Moreover, the likelihood that discovery and the preparation of testimony in this case would proceed in parallel with similar tasks in other cases in neighboring states was known to all parties, including Verizon.<sup>5</sup>

(4)

Finally, Verizon's objections to the timing and number of AT&T and WorldCom's discovery requests are flatly at odds with Verizon's own offensive discovery efforts in this proceeding. To date, Verizon has served over 173 questions on

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<sup>4</sup> According to their websites, Verizon's two outside law firms have over 750 and over 400 lawyers, respectively. *See* [www.hunton.com](http://www.hunton.com) and [www.wilmer.com](http://www.wilmer.com).

<sup>5</sup> At the risk of belaboring the obvious, AT&T and WorldCom, not just Verizon, have faced the burden of participating in simultaneous litigation in multiple states. In July alone, for example, AT&T's lawyer and witness team participated in hearings in the Maryland USF proceeding, prepared and filed a 150-page post-trial brief in the New Jersey UNE proceeding, and prepared direct testimony in this proceeding—all while responding to approximately 240 discovery requests from Verizon in this proceeding, in addition to the discovery requests from Verizon in the Maryland UNE proceeding.

AT&T and WorldCom—many of them with multiple subparts. Verizon filed some 82 of its discovery requests as recently as Friday, August 10, 2001,<sup>6</sup> one day *after* AT&T and WorldCom served their most recent set on Verizon.<sup>7</sup> For its part, AT&T has never objected to a single question.<sup>8</sup> AT&T and WorldCom together have provided virtually all responses on time.

## CONCLUSION

Verizon received the majority of the AT&T/WorldCom questions before August 1, meaning that its answers were (and are) due before rebuttal testimony is scheduled to be filed on August 17.<sup>9</sup> AT&T and WorldCom do not oppose a one week extension of the filing date for rebuttal testimony—i.e., until August 24. There is no justification, however, for a longer extension. Likewise, AT&T and WorldCom do not object to a one-week extension of the filing date for surrebuttal testimony—i.e., from September 5 to September 12. AT&T and WorldCom oppose an extension greater than one week, however, because a longer extension would not preserve an adequate interval of time between the filing of surrebuttal testimony and the commencement of oral hearings.

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<sup>6</sup> On August 10, Verizon issued two sets of data requests to AT&T and WorldCom containing 82 requests regarding AT&T and WorldCom's cost model.

<sup>7</sup> Verizon, thus, is being more than a bit disingenuous to complain about AT&T and WorldCom raising questions that will not need to be answered until after rebuttal testimony is due. Information obtained in response to those data requests can be used during the hearings on cross examination. Apparently Verizon has the same plans. (See preceding footnote).

<sup>8</sup> Verizon, in contrast, has provided blanket "general objections" to almost every single question AT&T and WCom have raised.

<sup>9</sup> The AT&T/WorldCom discovery was served on July 23, 24, 26 and 27, and August 1, meaning that responses were (and are) due by August 16.

As a condition for the extension, the Commission should direct Verizon to serve answers to all outstanding discovery requests by noon, Monday, August 20, 2001. If Verizon fails to do so, AT&T and WorldCom should be permitted to address issues arising from Verizon's late-filed data responses in their surrebuttal testimony.<sup>10</sup>

Respectfully submitted,



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*Counsel for WorldCom*

August 14, 2001

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<sup>10</sup> If Verizon believes that the AT&T/WorldCom surrebuttal testimony raise issues that are so damaging to Verizon's case as to warrant a response, Verizon can petition for permission to file rejoinder testimony. AT&T and WorldCom, of course, reserve their right to object to any such request.

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FEDERAL GOVERNMENT OF CANADA  
OFFICE OF THE SECRETARY

# ATTACHMENT A



Before the  
Federal Communications Commission  
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In the Matter of	)	
Petition of AT&T Communications	)	
of Virginia, Inc., Pursuant	)	CC Docket No. 00-251
to Section 252(e)(5) of the	)	
Communications Act, for Preemption	)	
of the Jurisdiction of the Virginia	)	
State Corporation Commission	)	
Regarding Interconnection Disputes	)	
with Verizon-Virginia, Inc.	)	

**AT&T's Ninth Set Of Data Requests To Verizon Virginia, Inc.**

AT&T Communications of Virginia, Inc., TCG Virginia, Inc., ACC National Telecom Corp., MediaOne of Virginia and MediaOne Telecommunications of Virginia, Inc. (together, "AT&T") hereby propounds the following data requests upon Verizon Virginia Inc. ("VZ-VA"), to be answered by those officers, employees or agents of VZ-VA as may be cognizant of the requested information and who are authorized to answer on behalf of VZ-VA.

These data requests are propounded on a continuing basis so as to require you to submit supplemental answers and/or documents should additional information become known that would have been includable in your answers and document production had they been known or available, or should information and/or documents supplied in the answers or production prove to be incorrect or incomplete. AT&T reserves the right to propound additional data requests and to request additional documents as and if additional information is required.

The data requests are to be answered in writing under oath and documents are to be furnished within fifteen (15) days after service, and served in-hand upon the undersigned within the time period prescribed by the Commission.

**Instructions:**

A. The obligation to respond to these Data Requests is ongoing. As additional responsive materials become available, please provide them.

B. In response to each Data Request please answer each question on a separate sheet of paper restating the question in full and identify the person or persons who prepared the response. For any information claimed to be unavailable, please state the reason why it is unavailable and provide any information that is available which is similar to the requested information.

C. If you object to any part of a data request, answer all parts of such request to which you do not object, and as to each part to which you do object, within three days of the receipt of the request, separately set forth the specific basis for the objection.

D. If any document or information is withheld on the ground of privilege, within three days of the receipt of the request, please identify the document, provide a summary of the document, and state the basis for the privilege asserted.

E. With respect to any document related to any matter addressed in the attached data request, if the document is not in your possession, but you know or believe that it exists, you are requested to identify and indicate to the best of your ability the present or last known location of the document and its custodian.

F. For any information that you claim is unavailable, state the reason why it is unavailable and provide any information that is available which is similar to the requested information.

G. If you assert that any document related to any matter addressed in any question in the attached data request has been destroyed or transferred beyond your control, please state the following: (a) identify by full name, official title, and address(es), any person who destroyed the document and any person involved in ordering the destruction of the document; (b) state the time, place and method of, and reasons for its destruction, including any and all documents relating to the order or act of such

destruction; (c) if destroyed or disposed of by operation of a document destruction program or retention policy, identify and produce a copy of the guideline, policy, or manual describing the document destruction program or retention policy; (d) if transferred, identify the person authorizing transfer and state the time, place, and method of, and reason for, its transfer, including any and all documents relating to the transfer; (e) identify each and every person listed as an addressor, addressee, or indicated on blind copies, or to whom it was distributed, shown, or explained; and (f) state or identify the date, subject matter, number of pages, attachments, and appendices of the document.

H. In responding to each question in the attached data request, please provide information available from all your corporate and individual files, from any affiliated companies, from all companies over which you exercise control or that exercise control over you, from all past and present board members, officers, and employees of any such companies, and from all attorneys, investigators, and representatives of any such companies.

I. If a response to any of the attached data requests requires any calculations, analyses, assumptions or studies, please identify and provide copies of such calculations, analyses, assumptions, or studies, and include all work papers relating thereto.

J. Whenever specific information, such as a date or figure, is requested and you are unable to give the exact information, give your best estimate thereof.

K. Provide one copy of all responses to these Data Requests to each of the following:

Mark Keffer, Esq.  
Danny Long  
AT&T Communications of Virginia, Inc.  
3033 Chain Bridge Road,  
Room 3D  
Oakton, Virginia 22185-0001

## **Definitions**

As used herein, the following terms have the meaning as set forth below:

1. The term "VZ-VA" or "the Company" or "you" shall include Verizon Virginia Inc. and its former and present officers, attorneys, employees, servants, agents and representatives, and any person acting on their behalf for any purpose as well as any affiliates providing service in Virginia, including but not limited to Verizon Advanced Data, Inc ("VADI") and Verizon Advanced Data – Virginia, Inc ("VADVA").

2. "List", "describe", "explain", "specify" or "state" shall mean to set forth fully, in detail, and unambiguously each and every fact of which VZ-VA or its agents or representatives have knowledge which is relevant to the answer called for by the data request.

3. The terms "document" or "documents" as used herein shall include, without limitation, any writings and documentary material of any kind whatsoever, including but not limited to material consisting of letters, words, or numbers, or their equivalent, set down by handwriting, typewriting, printing, photostating, photographing, magnetic impulse, mechanical or electronic recording, or other form of data compilation, both originals and copies (regardless of origin and whether or not including additional writing thereon or attached thereto), and any and all drafts, preliminary versions, alterations, modifications, revisions, changes and written comments of and concerning such material, including but not limited to: correspondence, letters, memoranda, notes, reports, directions, studies, investigations, questionnaires and surveys, inspections, permits, citizen complaints, papers, files, books, manuals, instructions, records, pamphlets, forms, contracts, contract amendments or supplements, contract offers, tenders, acceptances, counteroffers or negotiating agreements, notices, confirmations, telegrams, communications sent or received, print-outs, diary entries, calendars, tables, compilations, tabulations, charts, graphs, maps, recommendations, ledgers, accounts, worksheets, photographs, tape recordings, movie pictures, videotapes, transcripts, logs, workpapers, minutes, summaries, notations and records of any sort (printed, recorded or otherwise) of any oral communication whether sent or received or neither, and other written records or recordings, in whatever form, stored or contained in or on whatever medium including computerized or digital memory or magnetic media that:

- (a) are now or were formerly in your possession, custody or control; or
- (b) are known or believed to be responsive to these data requests, regardless of who has or formerly had custody, possession or control.

4. The term "date" shall mean the exact day, month and year, if ascertainable, or if not, the best approximation thereof, including relationship to other events.

5. The term "person" or "persons" means and includes any individual, committee, task force, division, department, company, contractor, state, federal or local government agency, corporation, firm, association, partnership, joint venture or any other business or legal entity.

6. The terms "identify" and "identity" when used with reference to a natural person mean to state his or her full name, present or last known address, present or last known telephone number, present or last known place of employment, position or business affiliation, his or her position or business affiliation at the time in question, and a general description of the business in which he or she is engaged.

7. The terms "identify" and "identity" when used with respect to any other entity mean to state its full name, the address of its principal place of business and the name of its chief executive officers.

8. The terms "identify" and "identity" with respect to a document mean to state the name or title of the document, the type of document (e.g., letter, memorandum, telegram, computer input or output, chart, etc.), its date, the person(s) who authored it, the person(s) who signed it, the person(s) to whom it was addressed, the person(s) to whom it was sent, its general subject matter, its present location, and its present custodian. If any such document was but is no longer in the possession of VZ-PA or subject to its control, state what disposition was made of it and explain the circumstances surrounding, and the authorization, for such disposition, and state the date or approximate date thereof.

9. The terms "identify" and "identity" with respect to any non-written communication mean to state the identity of the natural person(s) making and receiving the communication, their respective principals or employers at the time of the communication, the date, manner and place of the communication, and the topic or subject matter of the communication.

10. The term "oral communication" means any utterance heard, whether in person, by telephone, or otherwise.

11. The term "identify the sources" means to identify and specify all documents and non-written communications upon which you rely in support of the allegation, contention, conclusion, position or answer in question, to state the references drawn from each such source upon which you rely in support of such allegation, contention, conclusion, position or answer and to identify all individuals whom you know to be knowledgeable with respect to the subject matter of such allegation, contention, conclusion, position or answer. Where a source is a public record (e.g., a newspaper, trade journal, judicial or administrative opinion), a quotation and page reference of the material relied upon shall be supplied.

12. The term to "state the basis" for an allegation, contention, conclusion, position or answer means (a) to identify and specify the sources therefore, and (b) to identify and specify all facts on which you rely or intend to rely in support of the allegation, contention, conclusion, position or answer, and (c) to set forth and explain the nature and application to the relevant facts of all pertinent legal theories upon which you rely for your knowledge, information and/or belief that there are good grounds to support such allegation, contention, conclusion, position or answer.

13. The terms "and" and "or" have both conjunctive and disjunctive meanings as necessary to bring within the scope of the data requests and request any information or documents that might otherwise be construed to be outside their scope; "all" and "any" mean both "each" and "every".

14. The terms "relates to" or "relating to" mean referring to, concerning, responding to, containing, regarding, discussing, describing, reflecting, analyzing, constituting, disclosing, embodying, defining, stating, explaining, summarizing, or in any way pertaining to.

## DATA REQUESTS

1. Please provide all analyses VZ has done to compare the vendor material net prices and discounts among Siemens, Nortel and Lucent switches.
2. Please provide all analyses VZ has done to compare the vendor list prices for Siemens, Nortel and Lucent switches to SCIS list prices.
3. Please provide all analyses VZ has done to compare the vendor net prices for Ericsson, Siemens, Nortel and Lucent switches compared to the SCIS switch total investment outputs.
4. If Verizon were to purchase a new switch in 2001, please identify the discounts, switch price per line and/or other pricing information that would be applicable for each switch manufacturer. Please specify the precise contract, quote, and/or other document that supports the discount and/or other pricing information provided. Please provide these documents.
5. Please identify the name, date and number of all the contracts that are in effect or other documentation for each switch manufacturer that could control the price of a new switch (host, standalone and/or remote). Please provide these contracts. If VZ claims there are no contracts currently in effect for new switch purchases for a particular switch manufacturer, please provide all documents concerning, supporting, referring or relating to this claim.
6. Please provide all contracts or that are in effect or other documentation for each switch manufacturer that could control the price of switching hardware equipment (not included in the new switch documentation above).
7. Referencing the software expenditures in the RTU factor study:
  - a) Please correlate the FRC 1877 with the ARMIS account codes (i.e., 2212) and and subaccounts.
  - b) Please identify and describe the ARMIS subaccounts for account 2212 shown on the investments page of the RTU factor study.
  - c) Please provide the documentation, calculations and analysis used to produce the RTU expenditures.
  - d) Please provide the RTU expenditures by ARMIS subaccounts. If this data is not available, please provide the lowest level of detail available.
  - e) Please define and explain the Projects portion of the software budget. Please provide examples of the types of RTUs contained in the Network Services, Enterprise Solutions and Retail Markets RTU forecasts.
  - f) Please explain the adjustment for 2001 Software Purchases.
  - g) Please explain what "growth" means on Line 2 of Software Budget.
  - h) Please provide the documentation, calculations and analysis used by the budget organization to produce the RTU 2001 RTU forecast.

- i) Please provide the documentation, calculations and analysis used by the budget organization to produce the RTU 2002 RTU forecast.
  - j) Please identify whether any buy-out software is included in the expenditures or forecasts. Please identify the functions the software provides and specify the total dollar amount(s) of the buy-out and how much was allocated to each year in the RTU study. Please provide the contract or agreement supporting the buy-out.
  - k) Please explain the difference between the two Part G-9 RTU documentation files.
8. Referencing VA BHTD Support file – please explain each column in the file and how the data was used in the study.
9. Referencing the DS- Port cost study documentation, section 1.3, please explain what “processor investments” are included, how these investments were developed, and how VZ avoided double counting these processor investments in the switch MOU costs.
10. Please provide documentation so that a reviewer of the switch cost studies can identify precisely the SCIS output(s) that is used for each switch investment in the spreadsheets. Please provide documentation so that the reviewer can trace the UNE cost all the way back to a specific SCIS output.
11. Please identify any switches that are in VZ-VA’s network, but not included in SCIS database. Please explain why they were excluded. Identify each excluded switch by CLLI and include the following information:  
lines per switch  
trunks per switch  
host, remote, or standalone switch  
switch manufacturer
12. Please provide the CCS growth trends or other data used to project the usage out to 2002.
13. Please state the year the SCIS/MO input data was collected and what year the data represents.
14. Please list each utilization factor for lines (different types) and trunks and explain how it was derived. Please provide all supporting documentation used to derive these factors.
15. Please state the year the SCIS/TN input data was collected and what year the data represents.



16. Please provide the following in electronic and paper format: list all switches currently deployed in Virginia by CLLI and provide the following information for each CLLI:
  - a) Vendor (Lucent, Nortel, etc.)
  - b) Type of switch (host, standalone, remote)
  - c) Number of lines
  - d) Number of trunks
  - e) Average processor utilization
18. Please provide the number of VZ's VA end office trunks (DS0s) for each year, 1996-2001. If all years are not available, please provide what is available.
19. Please provide a list of switch features that are currently available to VZ subscribers, but not included in the Verizon cost study either as a port additive or as a feature that is purported to be in the local switch usage. How does Verizon propose to provision and price a feature to a CLEC that is available, but not included in the Verizon cost study?
20. Please provide the SCIS/MO inputs used by Verizon in this docket in an uploadable Excel file.
21. Please provide the SCIS/IN database with inputs used by Verizon.
22. Please explain the difference in switch functions between the UNE switch terminating MOU and the reciprocal compensation terminating MOU.
23. Please explain the cost difference between the UNE switching terminating MOU and the reciprocal compensation terminating MOU. Please list each reason, describe and quantify the cost of each one that contributes to the difference between the two costs.
24. Please explain the difference in switch functions between the UNE tandem switching MOU and the reciprocal compensation tandem MOU.
25. Please explain the cost difference between the UNE tandem switching MOU and the reciprocal compensation tandem MOU. Please list each reason, describe and quantify the cost of each one that contributes to the difference between the two costs.
26. Please provide documentation for all feature SCIS/IN inputs used in Verizon's cost study. If documentation is not available, please identify the source for the inputs. Please explain the rationale and assumptions made for each input.
27. Please confirm or deny whether feature costs include any cost other than feature-related hardware. If yes, please list each feature that includes other costs, describe and quantify the non feature-related hardware costs that are included.

28. Please confirm or deny whether right to use fees are added to any of the feature costs. If yes, please list each feature that have right to use fees. Describe the right to use fee and quantify the cost associated with the fee for each feature.
29. For each feature included in Verizon's cost study that has a separate rate element, please provide the following as it pertains to VZ-VA's actual deployment: List the number of lines (or trunks, as appropriate) and penetration ratios (lines with feature compared to total lines) for each feature. Please also identify the lines and penetration ratios by switch technology (Lucent vs. Nortel) for each feature.
30. Please provide the following data about switch equipment forecasted by Verizon for Virginia for the period from January 1, 2001, to December 31, 2005, identified by CLLI:
  - (a) the number of new remotes expected to be installed (specify CLLI and vendor);
  - (b) the number of switches that will be replaced by a different switch manufacturer (specify CLLI and vendor and which ones, if any, were also included in part a above; and
  - (c) the number of remote switches that will be replaced by a new remote (specify CLLI, manufacturer, and which, if any, were included in parts a or b above); and
  - (d) the number of new host or standalone switches expected to be installed (specify vendor).
31. Please provide the underlying data to the lowest amount of detail available (not a summary) from the PICS/DCPR for the column marked in-place cost in VZ EF&I and power DCPR data 1988.xls for the 377C equipment in Virginia. Either describe or explain such DCPR data in sufficient detail that it can be understood.
32. Please specify the average processor utilization separately for 5E switches and DMS switches as reported by SCIS in VZ's non-compliance (standard) cost study.
33. Please explain whether the current contract for Lucent that controls the price of the Lucent equipment purchases that support the vendor discount was negotiated by VZ with the intent to satisfy growth and/or upgrade requirements of existing digital switches or whether they were negotiated with the intent to purchase new host or standalone switches.
34. Please explain whether the current contract for Nortel that controls the price of the Lucent equipment purchases that support the vendor discount was negotiated by VZ with the intent to satisfy growth and/or upgrade requirements of existing digital switches or whether they were negotiated with the intent to purchase new host or standalone switches.
35. Please explain whether the current contract for Siemens that controls the price of the Lucent equipment purchases that support the vendor discount was negotiated

by VZ with the intent to satisfy growth and/or upgrade requirements of existing digital switches or whether they were negotiated with the intent to purchase new host or standalone switches.

36. Please confirm or deny whether the equipment purchases for Siemens, Lucent or Nortel contain all the equipment necessary to deploy a new switch. Please answer separately with respect to each vendor.
37. Please identify what percentage of all digital loop carrier ("DLC") line switch ports are universal DLC, and what percent of total switched access line ports are UDLC, both in Verizon's Virginia's network today and within the network reflected in Verizon's cost study filing. If the cost study numbers are different than the actually deployed lines in Virginia, please explain how this number was developed for use in the study. Please provide all supporting documentation and calculations.
38. Please state whether VZ-VA plans to install GR303-compliant digital loop carrier that is integrated into the switch. If not, please explain why not and provide documentation that supports the explanation.
39. What engineering tables do VZ-VA's engineers use to determine trunk group sizes (e.g., Erlang B, Poisson, etc.). Please provide these tables.
40. Please identify the average size trunk group (DS0s) for end office to end office in Virginia.
41. Please identify the average size trunk group (DS0s) for end office to tandem trunk in Virginia.
42. Please identify the average percent of end office to end office trunks of total interoffice trunks in Virginia.
43. Please provide supporting documentation for all inputs used to calculate the non conversation time factor, including the timeframes of all data collected.
44. Please describe how VZ pays for right to use fees (not limited to RTU included in the study), including, but not limited to per switch, per port, buyout for all switches, etc.
45. Please provide VZ's best estimate of the current or recent annual dollars (and/or percentage) spent for each type of RTU (for all Verizon, per switch, per port, etc.).
46. Please provide VZ's best estimate of how much of the RTU fee included in the cost study is paid for on a per port, per switch or other basis identified in the questions above.

47. Please explain whether any combination local/tandem switches are currently deployed in Virginia. If so, please provide a list of CLLIs and the manufacturer of each combination switch. For each combination switch, please provide the number of subscriber lines per switch, the number of local trunks and the number of tandem trunks per switch.
48. Please specify what UNE port rate element(s) could apply for a customer on the UNE-Platform.
49. Please confirm or deny whether a subscriber current served on an analog line that migrated to a CLEC, would cause an analog line port UNE charge to be incurred by the CLEC. If not, please identify what port charge would apply and explain why.
50. Please confirm or deny whether a subscriber currently served on IDLC that migrated to a CLEC as a UNE-P customer, would cause an integrated digital loop carrier UNE port charge to be incurred by the CLEC. If not, please identify what port charge would apply and explain why.
51. Please provide VZ's most current engineering guidelines for switching.
52. Please provide VZ's most current engineering guidelines and other documentation regarding planning, engineering or deploying GR303 DLC.
53. Please provide a list of new and replacement switch purchases (include a new remote as a new switch) purchased, or planned for purchase between 1999 and 2004 for Verizon Virginia. Identify each switch by CLLI code, if available, the number of lines, the number of trunks, whether it is a new wire center or a replacement switch (for replacement switches include old vendor and new vendor), and the type of switch (host, remote, standalone).
54. Please provide a list of new and replacement switch purchases (include a new remote as a new switch) purchased, or planned for purchase between 1999 and 2004 for any Verizon entity, including the former GTE. Identify each switch by CLLI code, if available, the number of lines, the number of trunks, whether it is a new wire center or a replacement switch (for replacement switches include old vendor and new vendor), and the type of switch (host, remote, standalone).
55. Please provide competitive bid, budget forecasts and all other documentation referencing the price and discounts for new switches placed in Virginia between 1999 and 2004.
56. Please provide a list of new and replacement switch purchases (include a new remote as a new switch) purchased, or planned for purchase between 1999 and 2004 for any Verizon entity, including the former GTE. Identify each switch by CLLI code, if available, the number of lines, the number of trunks, whether it is a

new wire center or a replacement switch (for replacement switches include old vendor and new vendor), and the type of switch (host, remote, standalone).

57. Please provide competitive bid, budget forecasts and all other documentation referencing the price and discounts for either the most recently installed new host or standalone switch and a tandem switch purchased included in the Verizon-wide list above.
58. Please provide competitive bid, budget forecasts and all other documentation referencing the price and discounts for either a planned new host or standalone switch and a tandem switch purchase in 2001-2004 in the Verizon-wide list above.
59. Please explain why VZ-VA feels the proposed percentage of lines per vendor (Lucent, Siemens, Nortel) is forward-looking.
60. Referencing the vendor equipment purchase lists that support the discount development, please identify what portion is associated with new switch installations, growth additions to existing switches, and upgrading existing switches.
61. Please provide the call set-up analysis referenced in the NCT factor adjustment. Please specify the year(s) of the data used in the analysis and explain how the data was collected.
62. Please explain, in detail, the disparity in utilization between an analog line port and DLC line ports.

Respectfully submitted

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Mark Keffer

RECEIVED

AUG 15 2001

FEDERAL BROADCASTING COMMISSION  
OFFICE OF THE SECRETARY

# ATTACHMENT B

## Redacted Version

**RECEIVED**

Before the  
Federal Communications Commission  
Washington, D.C. 20554

AUG 15 2001

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

In the Matter of )  
Petition of AT&T Communications )  
of Virginia, Inc., Pursuant ) CC Docket No. 00-251  
to Section 252(e)(5) of the )  
Communications Act, for Preemption )  
of the Jurisdiction of the Virginia )  
State Corporation Commission )  
Regarding Interconnection Disputes )  
with Verizon-Virginia, Inc. )

In the Matter of )  
Petition of WorldCom, Inc. Pursuant )  
to Section 252(e)(5) of the )  
Communications Act for Expedited )  
Preemption of the Jurisdiction of the ) CC Docket No. 00-218  
Virginia State Corporation Commission )  
Regarding Interconnection Disputes )  
with Verizon Virginia Inc., and for )  
Expedited Arbitration )

**AT&T and WorldCom's First Set Of Data Requests To Verizon Virginia**

AT&T Communications of Virginia, Inc., TCG Virginia, Inc., ACC National Telecom Corp., MediaOne of Virginia and MediaOne Telecommunications of Virginia, Inc. (together, "AT&T") and WorldCom, Inc. ("WCOM") hereby propound the following data requests upon Verizon Virginia Inc. ("VZ-VA"), to be answered by those officers, employees or agents of VZ-VA as may be cognizant of the requested information and who are authorized to answer on behalf of VZ-VA.

These data requests are propounded on a continuing basis so as to require you to submit supplemental answers and/or documents should additional information become known that would have been includable in your answers and document production had

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they been known or available, or should information and/or documents supplied in the answers or production prove to be incorrect or incomplete. AT&T reserves the right to propound additional data requests and to request additional documents as and if additional information is required.

The data requests are to be answered in writing under oath and documents are to be furnished within fifteen (15) days after service, and served in-hand upon the undersigned within the time period prescribed by the Commission.

**Instructions:**

A. The obligation to respond to these Data Requests is ongoing. As additional responsive materials become available, please provide them.

B. In response to each Data Request please answer each question on a separate sheet of paper restating the question in full and identify the person or persons who prepared the response. For any information claimed to be unavailable, please state the reason why it is unavailable and provide any information that is available which is similar to the requested information.

C. If you object to any part of a data request, answer all parts of such request to which you do not object, and as to each part to which you do object, within three days of the receipt of the request, separately set forth the specific basis for the objection.

D. If any document or information is withheld on the ground of privilege, within three days of the receipt of the request, please identify the document, provide a summary of the document, and state the basis for the privilege asserted.

E. With respect to any document related to any matter addressed in the attached data request, if the document is not in your possession, but you know or believe that it exists, you are requested to identify and indicate to the best of your ability the present or last known location of the document and its custodian.

F. For any information that you claim is unavailable, state the reason why it is unavailable and provide any information that is available which is similar to the requested information.



G. If you assert that any document related to any matter addressed in any question in the attached data request has been destroyed or transferred beyond your control, please state the following: (a) identify by full name, official title, and address(es), any person who destroyed the document and any person involved in ordering the destruction of the document; (b) state the time, place and method of, and reasons for its destruction, including any and all documents relating to the order or act of such destruction; (c) if destroyed or disposed of by operation of a document destruction program or retention policy, identify and produce a copy of the guideline, policy, or manual describing the document destruction program or retention policy; (d) if transferred, identify the person authorizing transfer and state the time, place, and method of, and reason for, its transfer, including any and all documents relating to the transfer; (e) identify each and every person listed as an addressor, addressee, or indicated on blind copies, or to whom it was distributed, shown, or explained; and (f) state or identify the date, subject matter, number of pages, attachments, and appendices of the document.

H. In responding to each question in the attached data request, please provide information available from all your corporate and individual files, from any affiliated companies, from all companies over which you exercise control or that exercise control over you, from all past and present board members, officers, and employees of any such companies, and from all attorneys, investigators, and representatives of any such companies.

I. If a response to any of the attached data requests requires any calculations, analyses, assumptions or studies, please identify and provide copies of such calculations, analyses, assumptions, or studies, and include all work papers relating thereto.

J. Whenever specific information, such as a date or figure, is requested and you are unable to give the exact information, give your best estimate thereof.

K. Provide one copy of all responses to these Data Requests to each of the following:

Mark Keffer, Esq.  
Danny Long  
AT&T Communications of Virginia, Inc.  
3033 Chain Bridge Road,  
Room B155

Oakton, Virginia 22185-0001

and

Jodie L. Kelley  
Jenner & Block LLC  
601 Thirteenth Street, N.W.  
Washington, D.C. 20005

and

Allen Freifeld  
Kimberly Wild  
WorldCom, Inc.  
1133 19th Street, N.W.  
Washington, D.C. 20036

### **Definitions**

As used herein, the following terms have the meaning as set forth below:

1. The term "VZ-VA" or "the Company" or "you" shall include Verizon Virginia Inc. and its former and present officers, attorneys, employees, servants, agents and representatives, and any person acting on their behalf for any purpose as well as any affiliates providing service in Virginia, including but not limited to Verizon Advanced Data, Inc ("VADI") and Verizon Advanced Data – Virginia, Inc ("VADVA").
2. "List", "describe", "explain", "specify" or "state" shall mean to set forth fully, in detail, and unambiguously each and every fact of which VZ-VA or its agents or representatives have knowledge which is relevant to the answer called for by the data request.
3. The terms "document" or "documents" as used herein shall include, without limitation, any writings and documentary material of any kind whatsoever, including but not limited to material consisting of letters, words, or numbers, or their equivalent, set down by handwriting, typewriting, printing, photostating, photographing, magnetic impulse, mechanical or electronic recording, or other form of data compilation, both originals and copies (regardless of origin and whether or not including additional writing thereon or attached thereto), and any and all drafts, preliminary versions, alterations, modifications, revisions, changes and written comments of and concerning such material, including but not limited to: correspondence, letters, memoranda, notes,

reports, directions, studies, investigations, questionnaires and surveys, inspections, permits, citizen complaints, papers, files, books, manuals, instructions, records, pamphlets, forms, contracts, contract amendments or supplements, contract offers, tenders, acceptances, counteroffers or negotiating agreements, notices, confirmations, telegrams, communications sent or received, print-outs, diary entries, calendars, tables, compilations, tabulations, charts, graphs, maps, recommendations, ledgers, accounts, worksheets, photographs, tape recordings, movie pictures, videotapes, transcripts, logs, workpapers, minutes, summaries, notations and records of any sort (printed, recorded or otherwise) of any oral communication whether sent or received or neither, and other written records or recordings, in whatever form, stored or contained in or on whatever medium including computerized or digital memory or magnetic media that:

- (a) are now or were formerly in your possession, custody or control; or
- (b) are known or believed to be responsive to these data requests, regardless of who has or formerly had custody, possession or control.

4. The term "date" shall mean the exact day, month and year, if ascertainable, or if not, the best approximation thereof, including relationship to other events.

5. The term "person" or "persons" means and includes any individual, committee, task force, division, department, company, contractor, state, federal or local government agency, corporation, firm, association, partnership, joint venture or any other business or legal entity.

6. The terms "identify" and "identity" when used with reference to a natural person mean to state his or her full name, present or last known address, present or last known telephone number, present or last known place of employment, position or business affiliation, his or her position or business affiliation at the time in question, and a general description of the business in which he or she is engaged.

7. The terms "identify" and "identity" when used with respect to any other entity mean to state its full name, the address of its principal place of business and the name of its chief executive officers.

8. The terms "identify" and "identity" with respect to a document mean to state the name or title of the document, the type of document (e.g., letter, memorandum, telegram, computer input or output, chart, etc.), its date, the person(s) who authored it,

the person(s) who signed it, the person(s) to whom it was addressed, the person(s) to whom it was sent, its general subject matter, its present location, and its present custodian. If any such document was but is no longer in the possession of VZ-PA or subject to its control, state what disposition was made of it and explain the circumstances surrounding, and the authorization, for such disposition, and state the date or approximate date thereof.

9. The terms "identify" and "identity" with respect to any non-written communication mean to state the identity of the natural person(s) making and receiving the communication, their respective principals or employers at the time of the communication, the date, manner and place of the communication, and the topic or subject matter of the communication.

10. The term "oral communication" means any utterance heard, whether in person, by telephone, or otherwise.

11. The term "identify the sources" means to identify and specify all documents and non-written communications upon which you rely in support of the allegation, contention, conclusion, position or answer in question, to state the references drawn from each such source upon which you rely in support of such allegation, contention, conclusion, position or answer and to identify all individuals whom you know to be knowledgeable with respect to the subject matter of such allegation, contention, conclusion, position or answer. Where a source is a public record (e.g., a newspaper, trade journal, judicial or administrative opinion), a quotation and page reference of the material relied upon shall be supplied.

12. The term to "state the basis" for an allegation, contention, conclusion, position or answer means (a) to identify and specify the sources therefore, and (b) to identify and specify all facts on which you rely or intend to rely in support of the allegation, contention, conclusion, position or answer, and (c) to set forth and explain the nature and application to the relevant facts of all pertinent legal theories upon which you rely for your knowledge, information and/or belief that there are good grounds to support such allegation, contention, conclusion, position or answer.

13. The terms "and" and "or" have both conjunctive and disjunctive meanings as necessary to bring within the scope of the data requests and request any information or

documents that might otherwise be construed to be outside their scope; "all" and "any" mean both "each" and "every".

14. The terms "relates to" or "relating to" mean referring to, concerning, responding to, containing, regarding, discussing, describing, reflecting, analyzing, constituting, disclosing, embodying, defining, stating, explaining, summarizing, or in any way pertaining to.

### **DATA REQUESTS**

1. Refer to Folder "Part G-4 Investment Loadings," File "Part G-4b-VA 2000 Investment Loading Factors (6-1-2001).xls," which develops the investment loading factors (VZVA 004622-4692).
  - a. Fully describe the PICS/DCPR database, including any manuals, descriptions, models, and methodology associated with the development of these data.
  - b. Provide material and in-place costs ("Total Cost Installed") for 1999 placements in the same fashion as that of "VZ EF&I & Power DCPR Data - 1998.xls" (VZVA 004647-4653).
  - c. Provide copies of invoices, work orders, or other project tracking documents that show material and in-place costs ("Total Cost Installed") for 10 projects that are included in the PICS/DCPR values used to calculate the loading factors.
2. Refer to Work Paper 1, Page 10 of the Investment Loading Factors study, also found at Sheet "WP1 Pg 10" of the file identified in ATT-VZVA-1, which develops the Land & Building factor (VZVA 004636).
  - a. Fully describe each of the "DCPR" and "FB Ledger" systems identified as sources of the data inputs, and identify the differences between how they report investments.
  - b. Provide any and all manuals, descriptions, models, and methodology associated with the development of these data.
  - c. Explain the use of 1999 data for this factor, as contrasted to the use of 1998 data for the investment loading factors for EF&I and Power.
  - d. Provide the entire "Separations / Part 64" report, including all cost pool allocations to account and sub-account and the accompanying definitions or documentation, used in File "VA L&B Distributions - 1999.xls" (VZVA 004639-4642).
3. Refer to Folder "Part G-9 RTU Factor," file, "Part G-9-VA RTU Factor\_2000\_documentation (6-1-2001).xls," which develops the Right to Use / Software factors (VZVA 004960-4968).

- a. Provide the source of the actual expenditures for 1999 and 2000, and any related work papers or documentation supporting these figures.
  - b. Provide the source of the budget forecasts for 2001 and 2002, and any related work papers or documentation supporting these figures.
  - c. Fully describe the adjustment item found in Line 8 of the Software Budget Forecast (VZVA 004968).
4. Refer to Folder "Part G-6 Property & Other Tax Factor," File "Part G-6 VA Prop-Oth Doc.xls," which develops the other tax factor (VZVA 004730-4733).
  - a. Provide column headings for the entries found on Sheet 1 "WP1 - Factor Development" (VZVA 004732).
  - b. Fully describe each account (e.g., "6690 SEBF Other").
  - c. Provide the basis on which each tax is calculated, including calculations that produce each figure.
  - d. Provide support for the statement that "property tax does not apply to Leased Investment," on Sheet 2 "WP 2 - Investments" (VZVA 004733).
5. Refer to Folder "Part G-7 Network Factors," File "Part G-7a - VA Network Exp Factors.xls," which develops the network factors (VZVA 004734-4948).
  - a. Provide the inputs required to calculate the revenue and expense adjustment figures on Sheet "WP4. Adjustmts" (VZVA 004735, 004752), including any related work papers or documentation supporting these values.
  - b. Provide the source of the 5% downward adjustment to metallic cable expenses, including any related work papers or documentation supporting these "technological improvements" (VZVA 004736, 004757).
  - c. Explain why investment in testing equipment is included with the expense factor (VZVA 004758).
  - d. For the expenses used to calculate the network factors (VZVA 004739-4766), identify the expenses associated with "Y2K compliance."
6. Refer to Folder "Part G-7 Network Factors," File "Part G-7b - Test Equip Inv.xls" (VZVA 004768-4828). Provide the methodology by which the "Plug-In Adjusted material Cost" and "Hardwire In-Place Cost" figures were identified.
7. Refer to Folder "Part G-7 Network Factors," File "Part G-7g - L&B Expense.xls," Sheets "VZ South Owned Report" and "VZ South Capital Lease" (VZVA 004935-4948).
  - a. Identify the source of the figures.
  - b. Fully define each of the column headings, which are "cp\_total," "cp\_total1," "cp\_total3," and "cp\_totalall."

8. Refer to Folder "Part G-5 Marketing Factor," File "Part G-5c - Mktng VZ South Revenue.xls." Provide the basis for the account and sub-account assignments (VZVA 004690-4691).
9. Refer to Folder "Part G-2 Common Overhead," File "Part G-2a - CommonvzW99 COM 12.95.xls," which develops the common overhead factor (VZVA 004485-4610).
  - a. Provide the inputs required to calculate the "% Avoided" figure for Total Operating Expense found in Sheet "WP 5 - Corporate Expense" (VZVA 004506).
  - b. Provide support for the "Booked Expense" figure in File "Part G-2d - CommOH FLC.xls" (Line 1 of VZVA 004589), and explain the difference from the "Total Company Expenses" figure used in Sheet "WP 2 - VZ-EAST" (VZVA 004491).
  - c. Provide the inputs required to calculate the "Capital Costs %" and "Expense Portion" figures in File "CommOH FLC.xls" (Lines 7 and 8 of VZVA 004589).
  - d. Provide the source of the figures used in Sheet "WP 2 - VZ-EAST" (VZVA 004489), including any calculations required to convert the Wholesale Support Investment Carrying Costs output by File "Part G-2b - SupportInvestCarryCosts.xls" (VZVA 004509).
  - e. Provide the inputs required to calculate the "CC/BC Ratio" figures used in File "Part G-2b - SupportInvestCarryCosts.xls" (Column "C" of VZVA 004507-4567).
  - f. Provide the "Activity Based Costing studies for assignment," including definitions of each account and sub-account and an explanation of the methodology used to assign them, used to calculate the "% Support Considered Corporate" figures in File "SupportInvestCarryCosts.xls" (Column "J" of VZVA 004507-4567).
  - g. Provide the source data, including definitions of each account and sub-account and an explanation of the methodology used to assign them, used to calculate the "Common % of Expense" figures in File "Part G-2c - CommOH Residual.xls" (Column "G" of VZVA 004575-4587).
10. Refer to Folder "Common Inputs" for the Unbundled Loop studies, File "5.1 Utilization Fill Factors.XLS" (VZVA 000147-169).
  - a. Provide support and documentation for the assignment of "Uncomm" lines used to calculate copper feeder fill (VZVA 000152-155).
  - b. Provide support and documentation for the "Effective Fill Adj" figures used to calculate copper distribution fill (VZVA 000156-159), and explain the use of different figures by wire center.
11. Refer to Folder "Common Inputs" for the Unbundled Loop studies, File "1.1 Cable Source Data.XLS" (VZVA 000009-23).

- a. Provide the Vintage Retirement Unit Cost (VRUC) database identified as "VA\_VRUC9799.mdb" (VZVA 000009), including all manuals, descriptions, and documentation.
  - b. Provide all inputs required to calculate the annual averages found in the column labeled "RUC RATE."
  - c. Does the VRUC database include costs for cable purchases, actual placements, or both?
  - d. Does the VRUC database include costs for new installations, upgrades to existing plant, or both?
  - e. Provide the inputs required to calculate the figures found in the column labeled "Cum TPI."
  - f. Provide copies of invoices, work orders, or other project tracking documents that show cost detail for 10 projects that are included in the VRUC values used to calculate copper and fiber cable investment.
12. Provide all current contracts for the placement of:
- a. Buried copper and fiber cable facilities;
  - b. Aerial copper and fiber cable facilities;
  - c. Poles;
  - d. Underground copper and fiber cable facilities;
  - e. Conduit and manholes; and
  - f. Buried service wires.
13. Provide all current joint pole agreements with other utilities or service providers, including private or municipal entities.
14. Provide all current joint buried agreements with other utilities or service providers, including private or municipal entities.
15. Provide all current pole attachment agreements with other utilities or service providers, including private or municipal entities.
16. Provide an explanation for each application of a forward-looking adjustment or conversion factor, the basis for each figure used, and any studies or other analyses used to determine or support each adjustment.
17. Produce all analyses of the forward-looking cost of capital, and any documents that were relied upon or used in preparing the analysis, including work papers supporting the:
- a. Cost of debt;
  - b. Cost of equity;
  - c. Debt/equity capital structure; and
  - d. Depreciation lives (economic lives).



18. Describe any factual basis for the implied assertion that the fill factors used in the cost study reflect efficient anticipated forward-looking fill levels.
19. Describe in detail any actual experience in constructing a forward-looking network that supports the position that existing fill levels are the only fill levels appropriate for a forward-looking network.
20. Refer to Folder "Common Inputs" for the Unbundled Loop studies, File "8.2 Technology Mix Assumption.XLS" (VZVA 000183-000194).
  - a. Explain the difference between the two types of integrated DLC assumed in the studies (GR303 and TR08).
  - b. Provide the detailed "CX data" and "DA Data" (as identified on VZVA 000190) that was summarized to produce the state-wide totals, including data that show the extent and mix of technology by wire center.
  - c. Provide any forecasts, showing future expectations of absolute levels, investments, or mix of technology, by wire center if available, including any related work papers or documentation supporting these forecasts.
  - d. Provide any other work papers supporting the DLC figures identified as "Engineering Assumption" (VZVA 000188).
21. Refer to Folder "Common Inputs" for the Unbundled Loop studies, File "4.1 Next Generation Digital Loop Carrier (NGDLC) Investments.XLS" (VZVA 000028-146).
  - a. Explain the rationale supporting the calculations that produce the "Number of RTs per COT" figures in Sheet "Summary" (VZVA 000031).
  - b. Provide the contract with Alcatel, issued April 20, 1999 (referenced in Sheet "Price List" and VZVA 000141).
  - c. Provide any contracts or other agreements (including price quotes) for each manufacturer or supplier of DLC equipment entered into (or received) since April 20, 1999.
22. Provide the source document identified as "Litespan Engineering & Planning OSP 363-205-010 issue 6" (VZVA 000186) in its entirety.
23. Provide the following source documents identified on VZVA 000276 in their entirety:
  - a. DSC Practice "Litespan" Vol. 2;
  - b. Narrowband Services Application Guide; and
  - c. Wideband Services Application Guide.
24. Provide detail sufficient to categorize as replacement or growth the switch purchase and equipment sales information provided as "VA Switch Discount Support" (VZVA 03167-03240).
25. Provide all current switch purchase contracts or other agreements (including price quotes) for each vendor.

26. Produce forecasts of switch replacements, by wire center if available, including any related work papers or documentation supporting these forecasts.
27. Provide capital budgets or other plans for capital expenditures for switch upgrades, including any related work papers or documentation supporting these budgets or plans.
28. For each switch vendor, provide the specific replacement discount applicable to each of the following SCIS discount categories:
  - a. Materials;
  - b. Engineering;
  - c. Installation;
  - d. Main distribution frame; and
  - e. Switch protector.
29. For each switch vendor, provide the specific growth discount applicable to each of the following SCIS discount categories:
  - a. Materials,
  - b. Engineering;
  - c. Installation;
  - d. Main distribution frame; and
  - e. Switch protector.
30. Produce all correspondence, memoranda, proposals, request for proposals, notes, or any other written documentation (such as notes of verbal discussions) reflecting discussions between Verizon and Lucent, Nortel or any other vendor of switch equipment regarding switch prices to be available to Verizon following the closing of the merger with GTE.
31. State whether Verizon is currently in negotiations with any manufacturers of switch equipment that could affect prices paid for such equipment (whether new or growth). If your answer is in the affirmative, please provide all documents regarding these negotiations.
32. If Verizon anticipates that the deployment of ATM switching will displace any of its existing Digital ESS switches, please identify those switching locations that will be displaced and their anticipated replacement date.
33. Identify for each wire center the date of digital switch deployment and the number of working lines involved in the change from analog to digital switching technology.
34. Provide copies of all documents (including all instructions, questionnaires, etc.) relating to the survey of outside plant characteristics.
35. Regarding actual line growth since 1995:
  - a. What are the annual figures?

- b. What percentage was for new lines at new locations that required placement of new cables?
  - c. What percentage was for second lines?
  - d. What percentage was for third lines?
- 36. Provide estimates of annual demand growth for the next five years by wire center and type of service.
- 37. Provide estimates of annual demand growth for each feeder route. If the demand forecast extends beyond three years for any feeder route, provide the complete demand forecast by year for each of those feeder routes.
- 38. For the forward-looking copper feeder fill factor used in the cost study, describe separately the portion that is for:
  - a. Growth;
  - b. Maintenance and repair;
  - c. Administrative spare capacity; and
  - d. Defective parts that will not be economical to fix.
- 39. Please explain the method used by the cost study to recognize the fact that efficient companies will construct networks in an incremental fashion in response to growth and development.
- 40. Provide a complete copy of the:
  - a. Current outside plant engineering guidelines; and
  - b. Outside plant engineering guidelines in effect immediately prior to the current guidelines, and explain the differences between the prior engineering guidelines and those currently in effect.
- 41. Provide the detailed formulas and engineering guidelines or rules used to calculate and determine switch growth additions (analog line, GR303 line, digital trunk).
- 42. Provide a complete listing of all switches, showing for each the switch manufacturer (Lucent, Nortel, etc.), switch type (DMS-100, DMS RSC, DMS-10, etc.), CLLI, number of lines, and number of trunks.
- 43. Produce copies of all network planning documents (manuals or otherwise) that instruct Verizon's engineers how to select an appropriate objective fill factor when designing to the network.
- 44. Produce copies of all manuals or documentation that define or describe "objective fill."
- 45. Provide all documentation associated with the engineering, furnishing, and installation of Verizon's most recently installed digital tandem switch. Include all expenses associated with the installation including riggers, transportation, and heavy equipment, as well as all installation labor costs. Provide the total cost information on a per line basis.

46. Provide all documentation associated with the engineering, furnishing, and installation of Verizon's most recently constructed power plant including the addition of rectifiers, batteries, fuse distribution bays, automatic breakers, microprocessor, and the standby emergency generator. Include all expenses associated with the installation including riggers, transportation, and heavy equipment, as well as all installation labor costs.
47. Describe all efforts currently underway or under consideration by Verizon to install feeder cable, and indicate whether copper or fiber cable is included, in what proportion, and the factors taken into account in determining whether fiber or copper cable will be installed.
48. For each of 1998, 1999 and 2000, identify the number of distribution relief jobs undertaken by Verizon. Provide documentation supporting each distribution relief job (such as Outside Plant Estimate Cases or other expenditure authorization) and showing the number of distribution lines relieved, the number of distribution lines after relief was completed and the total cost of the distribution relief job.
49. What assumption is made regarding the timing of the installation of the forward-looking network? Specifically, are the assets that are needed to serve demand for a particular service placed considered to be placed in service as of 2000, 2001, or another?
50. Refer to File "3.6 Wire Center Related Values.DOC" in the Unbundled Loop studies (VZVA 000263 - 000268). Fully define the fields identified as "Density\_Cell\_I" and "WC\_Class\_ID," including the descriptions of each code used and the thresholds or other calculations that produce each classification (e.g., "8 M").
51. Please produce the documents identified in the following list or, in the alternative, consent to other parties' use of copies of the same documents as produced by Verizon in other recent state UNE/USF proceedings. Because these documents were produced under proprietary arrangements, AT&T agrees to use these documents under the protection of the protective agreement in place in this proceeding. Please let us know if Verizon needs more information to determine the identify or location of these documents. If needed, we can produce complete copies for Verizon's review.

**[BEGIN VERIZON PROPRIETARY]**

- a.
- b.
- c.
- d.

e.

f.

g.

h.

i.

j.

k.

l.

m.

n.

o.

p.

q.

**[END VERIZON PROPRIETARY]**

Respectfully submitted

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Mark Keffer

**Before the  
Federal Communications Commission  
Washington, D.C. 20554**

**In the Matter of  
Petition of AT&T Communications  
of Virginia, Inc., Pursuant  
to Section 252(e)(5) of the  
Communications Act, for Preemption  
of the Jurisdiction of the Virginia  
State Corporation Commission  
Regarding Interconnection Disputes  
with Verizon-Virginia, Inc.**

**CC Docket No. 00-251**

**In the Matter of  
Petition of WorldCom, Inc. Pursuant  
to Section 252(e)(5) of the  
Communications Act for Expedited  
Preemption of the Jurisdiction of the  
Virginia State Corporation Commission  
Regarding Interconnection Disputes  
with Verizon Virginia Inc., and for  
Expedited Arbitration**

**CC Docket No. 00-218**

**CERTIFICATE OF SERVICE**

I hereby certify that on this 23<sup>rd</sup> day of July, 2001, a copy of AT&T and WordCom's First Set of Data Requests To Verizon was sent via overnight delivery and/or electronic mail to:

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Danny Long